

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 28 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Murray Sherman
Plant Manager, GAF Corporation
9215 Riverview Drive
St. Louis, Missouri 63137

Dear Mr. Sherman:

Docket No. VII-79-W-02

DTKF

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Site: Certaineed
ID #: M00980431162
Break: 11.6
Other: GAF Corp.
4-28-80

We have reviewed the actions taken by the GAF Corporation (GAF) in response to the Administrative Order issued on February 26, 1979. Each provision of the Order is discussed below:

Requirement 1: That GAF Corporation, 9215 Riverview Drive, St. Louis, Missouri cease discharging the toxic pollutant asbestos from outfall 002 and any other source under their authority contributing to the presence of asbestos in Maline Creek.

All discharges, including discharge 002, have been eliminated and all asbestos containing wastes have been isolated, thereby complying with this requirement. All necessary steps should be taken to insure that the asbestos containing wastes continue to be isolated in the future.

Requirement 2: That GAF Corporation comply with the sample collection procedures and reporting requirements of NPDES Permit No. MO 0000779.

This requirement became moot with the elimination of all point source discharges.

Requirement 3: That GAF Corporation comply with the sample collection and monitoring procedures for records keeping, permit limitations and reporting as required by NPDES Permit No. MO 0000779.

This requirement became moot upon termination of the NPDES discharge permit.

Requirement 4: That GAF Corporation remove asbestos contaminated material from the drainage ditch both upstream and downstream from discharge 002.

The asbestos contaminated materials were not removed from the drainage ditch upstream and downstream from discharge 002. However, our inspector concluded that all asbestos material had been covered and was no longer a threat to the environment. We consider this action to be satisfactory compliance with the Order as long as the cover is properly maintained.

CONCURRENCES							
SYMBOL	LEGL	LEGL	ENFC				
BURNAMF	SHIAL	Rompaga	S/d				
DATE	4/25/80	4-25-80	4-25-80				

Requirement 5: That GAF Corporation isolate asbestos contaminated material present in the waste piles on the facility site.

As noted above, all asbestos contaminated materials were found to have been effectively isolated.

The Environmental Protection Agency considers that you have satisfactorily complied with the terms of the Order and anticipates no further action in this matter.

Very truly yours,

Louise D. Jacobs
Director, Enforcement Division

cc: James P. Odendahl, Director
Division of Environmental Quality
Missouri Department of Natural Resources

C.F. Bien
GAF Corporation
1361 Alps Road
Wayne, New Jersey 07470

cc: Robert L. Morby, ARHM

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